

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, *et al.*,

*Defendants.*

Civ. No. 1:16-cv-00563 (LO/TCB)

**NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) are filing a Motion to File Documents Under Seal (“Motion”). In support of the Motion, Plaintiffs are filing a non-confidential Memorandum in Support of Plaintiffs’ Motion to File Documents Under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure certain exhibits to Plaintiffs’ Reply Memorandum in Support of Motion *in Limine*. A brief description of the contents of the documents that Plaintiffs request to file under seal is as follows:

- Exhibit 1: Confidential excerpts from Defendants’ designated 30(b)(6) deposition.
- Exhibit 2: Confidential excerpts from the deposition transcript of Peter Williams.
- Exhibit 3: Confidential excerpts from the deposition transcript of Albert Dwoskin.

- Exhibit 4: Communications between the parties related to Plaintiff's lease agreement which the parties have maintained as confidential.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

Respectfully submitted,

Date: June 28, 2021

\_\_\_\_\_  
//s//  
\_\_\_\_\_  
LEGAL AID JUSTICE CENTER  
Simon Sandoval-Moshenberg, VSB #77110  
*simon@justice4all.org*  
Nady Peralta, VSB #91630  
*nady@justice4all.org*  
Granville Clayton Warner, VSB #24957  
*cwarner@justice4all.org*  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
Phone: (703) 778-3450  
Fax: (703) 778-3454

QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Kaiyeu Kevin Chu, VSB #85746  
*kevinchu@quinnmanuel.com*  
Matthew Traupman (pro hac vice)  
*matthewtraupman@quinnmanuel.com*  
1300 I Street NW, Suite 900  
Washington, District of Columbia 20005  
Phone: (202) 538-8000  
Fax: (202) 538-8100

*Counsel for Plaintiffs*

**Certificate of Service**

I hereby certify that on this 28th day of June, 2021, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

//s//  
\_\_\_\_\_  
Simon Sandoval-Moshenberg (VSB No. 77110)  
*simon@justice4all.org*  
Legal Aid Justice Center  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
Tel: (703) 720-5605  
Fax: (703) 778-3454